

# EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

JESSICA HODGES, as natural guardian of )  
Minor children, LMC and DLC; ESTATE )  
OF LEE MICHAEL CREELY by and )  
Through Warren Ratchford, its )  
Administrator, )  
 )  
Plaintiffs, )  
 )  
v. )  
 ) Civil Action No. 4:22-cv-00067  
CHATHAM COUNTY, GEORGIA; )  
CORRECTHEALTH LLC; )  
CORRECTHEALTH CHATHAM, LLC; )  
CARLO MUSSO, M.D.; KAREN )  
FORCHETTE; ALFRED NEVELS; )  
SELENA CARDONA; TEANNA )  
FRANCES-HENDERSON; TERENCE )  
JACKSON; DON WHITE; KARLOS )  
MANNING; YVETTE BETHEL- )  
QUINNEY; LOWRETTA FLORENCE; )  
AMBER ANDERSON; JACKIE HARNED; )  
SUSAN RIVERA; and LOUIKISHA )  
ROBERTS, )  
 )  
Defendants. )

---

**DEFENDANTS CARDONA, JACKSON, FRANCES-HENDERSON, AND BETHEL-  
QUINNEY'S AMENDED ANSWER**

---

Selena Cardona, Terence Jackson, Teanna Frances-Henderson, and Yvette Bethel-Quinney, Defendants in the above-referenced matter, by and through undersigned counsel, file this, their Amended Answer to Plaintiffs' Complaint, by adding an affirmative defense, as follows:

SIXTEENTH DEFENSE

Plaintiffs' claims are barred in whole or in part by Lee Michael Creely's assumption of the risk of injury.

Respectfully submitted this 27<sup>th</sup> day of July, 2022.

OLIVER MANER LLP

/s/ Benjamin M. Perkins  
BENJAMIN M. PERKINS  
Georgia Bar No. 140997  
BRIAN D. GRIFFIN  
Georgia Bar No. 874951  
WILLIAM PHILLIPS  
Georgia Bar No.552370

*Attorneys for Selena Cardona, Terence Jackson, Yvette Bethel-Quinney, and Teanna Frances Henderson*

Post Office Box 10186  
Savannah, GA 31412  
Ph:(912) 236-3311  
[bperkins@olivermaner.com](mailto:bperkins@olivermaner.com)  
[bgriffin@olivermaner.com](mailto:bgriffin@olivermaner.com)  
[wphillips@olivermaner.com](mailto:wphillips@olivermaner.com)